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16	NORTHERN DISTRICT	OF CALIFORNIA		
17	SAN JOSE DI	VISION		
18	OKLAHOMA FIREFIGHTERS PENSION AND	Related Case No. 5:16-cv-02267-BLF		
19	RETIREMENT SYSTEM,	STIPULATION AND [PROPOSED]		
20	Plaintiff,	ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE		
21	VS.			
22	SUNEDISON, INC., et al.,	Judge: Hon. Beth Labson Freeman		
23	Defendants.			
24				
25	[Caption continued on following page.]			
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۷٥	STIPULATION AND [PROPOSED] ORDER TO CASE MA	NAGEMENT CONFERENCE		

Case Nos. 5:16-cv-02267-BLF; 5:16-cv-02269-BLF; 5:16-cv-02270-BLF; 5:16-cv-02272-BLF; 5:16-cv-02273-

BLF-NMC

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ANTON S. BADRI, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. Plaintiff, vs. Related Case No. 5:16-cv-02269-BLF Related Case No. 5:16-cv-02270-BLF Related Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02272-BLF NMC Related Case No. 5:16-cv-02272-BLF STIPULATION AND IPROPOSED I ORDER TO CASE MANAGEMENT CONFERENCE Case Nos. 5:16-cv-02273-BLF, 5:16-cv-02273-BLF			
Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. RON WORKERS MID-SOUTH PENSION FUND, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	1		Related Case No. 5:16-cv-02269-BLF
TERRAFORM GLOBAL, INC., et al., Defendants. RON WORKERS MID-SOUTH PENSION FUND, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Brian Wuebbels, et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	2	•	
TERRAFORM GLOBAL, INC., et al., Defendants. Related Case No. 5:16-cv-02270-BLF Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. TERRAFORM GLOBAL, INC., et al., Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Boefendants. TERRAFORM GLOBAL, INC., et al., Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Boefendants. TERRAFORM GLOBAL, INC., et al., Defendants. Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	3	Plaintiff,	
Related Case No. 5:16-cv-02270-BLF FUND, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Brian Wuebbels, et al., Defendants. Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	4	VS.	
Related Case No. 5:16-cv-02270-BLF Related Case No. 5:16-cv-02272-BLF NMC Related Case No. 5:16-cv-02273-BLF NMC SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Plaintiff, vs. Brian Wuebbels, et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	5	TERRAFORM GLOBAL, INC., et al.,	
FUND, Individually and on Behalf of Others FUND Plaintiff, VS. FUND PRIVATION AND (PROPOSED) ORDER TO CASE MANAGEMENT CONFERENCE	6	Defendants.	
Similarly Situated, Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, Vs. TERRAFORM GLOBAL, INC., et al., Plaintiff, Vs. TERRAFORM GLOBAL, INC., et al., Plaintiff, Vs. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, Vs. Brian Wuebbels, et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	7	IRON WORKERS MID-SOUTH PENSION	Related Case No. 5:16-cv-02270-BLF
Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Belated Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02273-BLF NMC Related Case No. 5:16-cv-02273-BLF NMC Related Case No. 5:16-cv-02273-BLF NMC SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, VS. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	8		
TERRAFORM GLOBAL, INC., et al., Defendants. MITTESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Plaintiff, vs. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	9	Districted	
TERRAFORM GLOBAL, INC., et al., Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Bilmon Fraser, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Related Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02273-BLF NMC Related Case No. 5:16-cv-02273-BLF- NMC SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants.	10	Fiamum,	
Defendants. MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Binon Fraser, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Related Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02273-BLF NMC Related Case No. 5:16-cv-02273-BLF NMC SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants.	11	vs.	
MITESH PATEL, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. TERRAFORM GLOBAL, INC., et al., Binan Wuebbels, et al., Defendants. Plaintiff, vs. Related Case No. 5:16-cv-02272-BLF Related Case No. 5:16-cv-02273-BLF- NMC Related Case No. 5:16-cv-02273-BLF- Related Case No. 5:16-cv-02273-BLF- NMC Related Case No. 5:16-cv-02273-BLF- NMC SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants.	12		
14 Others Similarly Situated, 15 Plaintiff, 16 Vs. 17 TERRAFORM GLOBAL, INC., et al., 18 Defendants. 19 SIMON FRASER, Individually and on Behalf of Others Similarly Situated, 21 Plaintiff, 22 Vs. 23 Brian Wuebbels, et al., 24 Defendants. 26 STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE		AUTOS A DA TODA A A LA L	D. L. J.G. N. 5.16 00050 D.F.
TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Related Case No. 5:16-cv-02273-BLF-NMC Related Case No. 5:16-cv-02273-BLF-NMC Plaintiff, vs. Brian Wuebbels, et al., Defendants.			Related Case No. 5:16-cv-02272-BLF
TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	15	Plaintiff,	
TERRAFORM GLOBAL, INC., et al., Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. Defendants. TRelated Case No. 5:16-cv-02273-BLF-NMC Related Case No. 5:16-cv-02273-BLF-NMC STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	16	VS.	
Defendants. SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	17	TERRAFORM GLOBAL, INC., et al.,	
SIMON FRASER, Individually and on Behalf of Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	18	Defendants	
Others Similarly Situated, Plaintiff, vs. Brian Wuebbels, et al., Defendants. Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	19	Defendants.	
Plaintiff, vs. Brian Wuebbels, et al., Defendants. Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	20		
22 Vs. 23 Brian Wuebbels, et al., 24 Defendants. 26 27 28 STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	21	Plaintiff	
Brian Wuebbels, et al., Defendants. Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	22	Traintiff,	
Defendants. Defendants. STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	23		
25 26 27 28 STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	24	Brian Wuebbels, et al.,	
27 28 STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	25	Defendants.	
28 STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	26		
STIPULATION AND [PROPOSED] ORDER TO CASE MANAGEMENT CONFERENCE	27		
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DI E NMC		Case Nos. 5:16-cv-02267-BLF; 5:16-cv-02269-BLF; 5:16-cv-	

BLF-NMC

undersigned counsel of record, submit the following stipulation and proposed order:

WHEREAS, on April 26, 2016, defendants removed, *inter alia*, the following actions from the Superior Court of California, San Mateo County to federal court: *Fraser v. Wuebbels et al.*

Pursuant to Civil Local Rules 6-2(a) and 7-12, the parties, by and through their respective

("Fraser"); Iron Workers Mid-South Pension Fund v. TerraForm Global, Inc. et al. ("Iron Workers"); Badri v. TerraForm Global, Inc. et al. ("Badri"); Patel v. TerraForm Global, Inc. et al.

("Patel"); Oklahoma Firefighters Pension and Retirement System v. SunEdison, Inc. et al. ("Oklahoma Firefighters") (collectively, the "Removed Actions");

WHEREAS, on May 10, 2016, the Court related the Removed Actions to *Beltran v*. *Terraform Global, Inc.*, Case 5:15-cv-04981-BLF ("*Beltran*") [*Beltran* Dkt. 115];

WHEREAS, on May 26 and 27, 2016, Plaintiffs moved to remand the Removed Actions [Fraser Dkt. 23; Badri Dkt. 30; Oklahoma Firefighters Dkt. 39-40; Iron Workers Dkt. 25-26; Patel Dkt. 27];

WHEREAS, on June 1, 2016, Defendants moved to transfer the Removed Actions to the Southern District of New York [*Fraser* Dkt. 24-25; *Iron Workers* Dkt. 27-28; *Badri* Dkt. 31-32; *Patel* Dkt. 28-29; *Oklahoma Firefighters* Dkt. 41, 43];

WHEREAS, Plaintiffs' motions to remand and Defendants' motions to transfer are scheduled to be heard on October 6, 2016;

WHEREAS, on June 14, 2016, the Court entered an Order granting the parties' Joint Stipulated Request to File Excess Pages and Extend Briefing Schedule, which provided that oppositions to the remand and transfer motions would be filed on July 14, 2016, and reply briefs in support of the motions would be filed on August 4, 2016;

WHEREAS, the upcoming Initial Case Management Conference ("CMC") and associated ADR deadlines in the Removed Actions are as currently set as follows:

	CASE SCHEDULE – ADR MULTI-OPTION PROGRAM		
Date	Event	Governing Rule	
7/14/2016	Last day to:	FRCivP 26(f) & ADR L.R. 3-5	

DR L.R.
DR L.R.
DR L.R.
DK L.K.
DR L.R.
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WHEREAS, in the interests of efficiency and comity, the parties believe that it would be prudent to continue the CMC and related deadlines currently scheduled in Removed Actions until after the parties have finished briefing and the Court has resolved the jurisdiction and venue questions presented in the competing motions to remand and transfer;

NOW, THEREFORE, the parties hereby STIPULATE and AGREE as follows:

- The CMC currently scheduled before the Court on August 4, 2016, at 11:00 a.m. in the Removed Actions, along with any associated deadlines under the Federal Rules of Civil Procedure and Local Rules (including ADR deadlines), shall be continued until after the Court rules on the motions to remand and transfer; and
- 2. In the event the Removed Actions remain before the Court after it rules on the motions to remand and transfer, the Parties shall, if necessary, assist the Court by timely requesting that a new CMC be scheduled in the Removed Actions.

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1	Dated: July 12, 2016	Resp	ectfully Submitted,
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28	STIPULATION AND [PROPOSED] ORDER	TO CO	NTINUE CASE MANAGEMENT CONFERENCE - 3

STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE Related Case Nos. 5:16-cv-02267-BLF, 5:16-cv-02269-BLF, 5:16-cv-02270-BLF, 5:16-cv-02272-BLF, and 5:16-cv-02273-BLF-PSG

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28	STIPULATION AND [PROPOSED] ORDER TO CO	DIEDNIE GAGE MANA GENERAL GOVERNENCE
	I STIPULATION AND IPROPOSEDI ORDER TO CO	JN LINUE CASE MANAGEMENT CONFERENCE A

1	PURSUANT TO STIPULATION, IT IS SO ORDERED.
2	Dated: R' ÁFI ÉAGEFÎ
3	Ben Jaly Melman
4	Honorable Beth Labson Freeman UNITED STATES DISTRICT JUDGE
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28	STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE

STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE Related Case Nos. 5:16-cv-02267-BLF, 5:16-cv-02269-BLF, 5:16-cv-02270-BLF, 5:16-cv-02272-BLF, and 5:16-cv-02273-BLF-PSG

SIGNATURE ATTESTATION I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order to Continue Case Management Conference. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatories have concurred in this filing. /s/ Timothy Perla Timothy Perla (Admitted *Pro Hac Vice*) DATED: July 12, 2016 WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6000 Facsimile: (617) 526-5000 Timothy.Perla@wilmerhale.com